

Ira D. Kharasch (CA Bar No. 109084)  
Victoria A. Newmark (CA Bar No. 183581)  
Hayley R. Winograd (*pro hac vice* application forthcoming)  
PACHULSKI STANG ZIEHL & JONES LLP  
10100 Santa Monica Blvd., 13th Floor  
Los Angeles, California 90067-4003  
Telephone: 310-277-6910  
Facsimile: 310-201-0760  
E-mail: ikharasch@pszjlaw.com  
vnewmark@pszjlaw.com  
hwinograd@pszjlaw.com

Christopher B. Harwood (*pro hac vice* application forthcoming)  
MORVILLO ABRAMOWITZ GRAND  
IASON & ANELLO P.C.  
Morvillo Abramowitz Grand Iason & Anello, P.C.  
565 Fifth Avenue,  
New York, NY 10017  
Telephone: 212-856-9600  
Facsimile: 212-856-9494  
E-mail: charwood@maglaw.com

Attorneys for YNS Funding, LLC, Aly Management, LLC and Yitzchok Blum

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SANTA ANA DIVISION**

In re

THE LITIGATION PRACTICE GROUP,  
P.C.,

Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

Adv. No. 8-25-ap-01191-SC

**THIRD STIPULATION TO CONTINUE  
DEADLINES**

Complaint Filed: March 18, 2025  
The Honorable Scott C. Clarkson

RICHARD A. MARSHACK, Trustee of  
the LPG Liquidation Trust,

Plaintiff,

vs.

YNS FUNDING, LLC, et al.,

Defendants.

1           **PLEASE TAKE NOTICE** that Plaintiff and Chapter 11 Trustee Richard A. Marshack  
2 (the “Trustee”) and Defendants YNS Funding, LLC (“YNS”), Aly Management, LLC (“Aly”) and  
3 Yitzchok Blum (“Blum,” collectively, the “Defendants,” and together with the Trustee, the  
4 “Parties”), hereby stipulate and agree (the “Stipulation”), through their respective counsel, as  
5 follows:

6           A.       On March 18, 2025, Plaintiff filed a Complaint for: (1) avoidance, recovery, and  
7 preservation of 2-year actual fraudulent transfers; (2) avoidance, recovery, and preservation of 2-  
8 year constructive fraudulent transfers; (3) avoidance, recovery, and preservation of 4-year actual  
9 fraudulent transfers; (4) avoidance, recovery, and preservation of 4-year constructive fraudulent  
10 transfers; (5) turnover; and (6) aiding and abetting against Blum. [Docket. No. 1].

11           B.       The initial deadline for YNS, Aly, and Blum to respond to the Complaint was  
12 April 28, 2025. [Docket No. 4].

13           C.       On April 28, 2025, the Parties filed a stipulation extending YNS, Aly, and Blum’s  
14 time to file and serve any response to the Complaint from April 28, 2025 to May 12, 2025 (“First  
15 Stipulation”) [Docket No. 10].

16           D.       On April 29, 2025, the Court approved the Parties’ First Stipulation. [Docket No.  
17 12].

18           E.       On May 12, 2025, due to discussions between the Parties that could resolve this  
19 matter without the need for further litigation, the Parties filed a stipulation extending the deadline  
20 for YNS, Aly, and Blum to file and serve a response to Plaintiff’s Complaint from May 12, 2025  
21 to **July 7, 2025** and continuing the status conference in this case from May 30, 2025 at 1:30 p.m.  
22 to **August 7, 2025** at 1:30 p.m. (“Second Stipulation”) [Docket No. 14].

23           F.       On May 13, 2025, the Court approved the Parties’ Second Stipulation. [Docket No.  
24 15].

25           G.       The Parties continue to engage in discussions and anticipate being able to resolve  
26 this matter without further litigation. Plaintiff therefore has agreed to continue the deadline for  
27 YNS, Aly, and Blum to serve a response to Plaintiff’s Complaint from July 7, 2025 to **September**  
28 **12, 2025**. Plaintiff has also agreed to continue the status conference in this case from August 7,

1 2025 at 1:30 p.m. to **October 16, 2025** at 1:30 p.m.

2 **STIPULATION**

3 WHEREFORE, based on the above and the foregoing, the Parties stipulate and agree as  
4 follows:

5 1. The deadline for YNS Funding, LLC, Aly Management, LLC, and Yitzchok Blum  
6 to file and serve any response to Plaintiff's Complaint shall be continued from July 7, 2025 to  
7 **September 12, 2025**.

8 2. The status conference in this case shall be continued from August 7, 2025 at 1:30  
9 p.m. to **October 16, 2025** at 1:30 p.m.

10 **IT IS SO STIPULATED.**

11 Dated: July 3, 2025

**DINSMORE & SHOHL LLP**

12  
13 By



14 Christopher B. Ghio  
15 Attorney for Plaintiff Richard A. Marshack,  
Trustee of the LPG Liquidation Trust

16  
17 Dated: July 3, 2025

**PACHULSKI STANG ZIEHL & JONES LLP**

18 By /s/ Ira D. Kharasch

19 Ira D. Kharasch

20  
21 Dated: July 3, 2025

**MORVILLO ABRAMOWITZ GRAND IASON &  
ANELLO P.C.**

22  
23 By



24 Christopher B. Harwood (*pro hac vice* application  
25 forthcoming)

26 Attorneys for YNS Funding, LLC, Aly  
27 Management, LLC and Yitzchok Blum  
28

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

10100 Santa Monica Blvd., 13<sup>th</sup> Fl., Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **THIRD STIPULATION TO CONTINUE DEADLINES** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **July 7, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:  
**8:25-ap-01191-SC Notice will be electronically mailed to:**

Christopher Ghio on behalf of Plaintiff Richard A. Marshack christopher.ghio@dinsmore.com,  
angelica.urena@dinsmore.com

Ira David Kharasch on behalf of Defendant Aly Management, LLC ikharasch@pszjlaw.com  
Ira David Kharasch on behalf of Defendant YNS Funding, LLC ikharasch@pszjlaw.com  
Ira David Kharasch on behalf of Defendant Yitzchok Blum ikharasch@pszjlaw.com

Richard A Marshack (TR) pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.co

Victoria Newmark on behalf of Defendant Aly Management, LLC vnewmark@pszjlaw.com,  
hdaniels@pszjlaw.com;bdassa@pszjlaw.com;hwinograd@pszjlaw.com  
Victoria Newmark on behalf of Defendant YNS Funding, LLC vnewmark@pszjlaw.com,  
hdaniels@pszjlaw.com;bdassa@pszjlaw.com;hwinograd@pszjlaw.com  
Victoria Newmark on behalf of Defendant Yitzchok Blum vnewmark@pszjlaw.com,  
hdaniels@pszjlaw.com;bdassa@pszjlaw.com;hwinograd@pszjlaw.com

United States Trustee (SA) ustregion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

### **2. SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 7, 2025  
Date

Myra Kulick  
Printed Name

/s/ Myra Kulick  
Signature

---

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.